

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Competitive Bidding Procedures For Auction
901 and Certain Program Requirements

)
)
) AU Docket No. 12-25
)
)

COMMENTS OF MATANUSKA TELEPHONE ASSOCIATION

Shannon M. Heim
Dorsey & Whitney LLP
1031 West 4th Avenue, Suite 600
Anchorage, AK 99501
(907) 276-4557

50 S. Sixth Street, Suite 1500
Minneapolis, MN 55402
(612) 340-8899

Counsel for Matanuska Telephone Association

March 16, 2012

I. Introduction.

Matanuska Telephone Association (“MTA”) files its Comments in this proceeding pursuant to the Public Notice issued by the Federal Communications Commission (“Commission”) on February 2, 2012 and the Extension granted on February 16, 2012.¹ MTA continues to analyze the data provided by the Commission. It has identified several Census Blocks that the Commission’s data suggest are unserved and thus eligible for the Mobility Fund Phase I reverse auction, but MTA’s data suggests that these Blocks are served, at least in part, by MTA. MTA believes that the errors in the Commission’s data further underscore that the reverse auction procedures contemplated for Auction 901 are problematic for the small, rural carriers serving Remote Alaska and will require substantial modification before applying them to any Mobility II proceeding.²

MTA Communications, LLC d/b/a MTA Wireless (“MTA Wireless”) is the wholly owned subsidiary of MTA. It provides wireless service in the Matanuska Susitna Valley, which lies about 40 miles northeast of Anchorage, Alaska. MTA Wireless serves approximately 12,000 customers using cellular and microwave technology.³ MTA Wireless’ service covers a substantial portion of the MTA local territory.

¹ See *Comment Sought on Competitive Bidding Procedures for Auction 901 and Certain Program Requirements*, Public Notice, DA-12-121 (Feb. 2, 2012) (“*Phase I Public Notice*”) and *Mobility Fund Phase I Auction Limited Extension of Deadlines*, DA 12-236 (Feb. 16, 2012) (“*Phase I Extension Public Notice*”).

² See generally Alaska Rural Coalition Comments, filed Feb. 28, 2012 (describing concerns with a reverse auction mechanism and the difficulty in applying reverse auction assumptions to Phase II funding mechanisms.).

³ MTA provides service with 1x and 3G EVDO technology using cellular (850) spectrum and microwave backhaul.

II. American Roamer Data Erroneously Identifies Census Blocks in the MTA Service Area as Eligible.

The Commission sought comment on whether the Census Blocks identified by the Commission using American Roamer data and other inputs were an accurate reflection of the mobile service currently available in those areas.⁴ MTA believes that the American Roamer Data released by the Commission misidentifies Census Blocks in the MTA service area as eligible for the Mobility Fund Phase I reverse auction.

MTA's analysis of the Census Blocks in the MTA service area is ongoing. The task of analyzing voluminous data in a short amount of time is difficult for small companies serving rural and remote areas of Alaska. The Commission's recent regulatory activity has stretched the MTA staff very thin. MTA shares its current conclusions and the data supporting them, but intends to supplement this analysis and data as necessary and relevant.

MTA compared the maps and lists of eligible Census Blocks to the data it provided to American Roamer.⁵ MTA discovered significant discrepancies that disqualify many Census Blocks from the Mobility Fund Phase I reverse auction.⁶ MTA has identified 173 Census Blocks that receive, in full or in part, mobile service from MTA's wireless subsidiary that disqualify them from eligibility. All of these Census Blocks are located in CMA 316.⁷ MTA believes that

⁴ See *Phase I Public Notice* at paras. 15-20.

⁵ The map containing MTA's service area data, Attachment 1, was provided to American Roamer, but likely not in time to be incorporated into the Commission's data. American Roamer received data from MTA regarding its 3G EVDO service coverage only recently. The difference between the data provided and the data released is significant, which prompted MTA to file these comments to correct the Commission's record.

⁶ The table of Census Blocks MTA believes are misidentified, Attachment 2, contains data regarding 173 Census Blocks in CMA 316.

⁷ See Attachment 2, MTA data.

providing a wireless carrier Mobility Fund Phase I support to provide 3G service in these areas would be duplicative of existing service.

MTA has not determined whether or not it will be able to participate in the reverse auction process. The substantial investment of time and resources to attempt to allocate money to rural and remote areas of Alaska are not likely to be recouped through a successful bid. Coupled with the overwhelming financial burdens placed on winning bidders, MTA must carefully analyze whether it is able to participate.⁸

III. Conclusion.

The availability of accurate data will underscore the validity of the reverse auction process. MTA appreciates the opportunity to review and comment on Census Block eligibility for the Mobility Phase I auction. MTA respectfully requests that the Commission's data be updated to reflect the wireless service its affiliate provides in CMA 316.

⁸ See *Comments of the Alaska Rural Coalition*, WC Docket No. 10-90 et al. (Jan. 18, 2012) (“*ARC USF Comments*”) at 20–21 (discussing the difficulty for small rural carriers to obtain a Letter of Credit).

Respectfully submitted on this 16th day of March 2012.

DORSEY & WHITNEY LLP
Attorneys for Matanuska Telephone Association

By:



Shannon M. Heim
1031 West 4th Avenue, Suite 600
Anchorage, AK 99501
Telephone: (907) 276-4557
Facsimile: (907) 276-4152

50 S. Sixth Street, Suite 1500
Minneapolis, MN 55402
Telephone: (612) 340-8899
Facsimile: (612) 340-2868
Email: heim.shannon@dorsey.com